

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

TOMMY BROWN, on his own behalf and  
on behalf of other similarly situated  
persons,

Plaintiff,

v.

TRANSWORLD SYSTEMS, INC., *et al.*,

Defendants.

No. 2:20-cv-00680-RSL

DEFENDANTS NATIONAL COLLEGIATE  
STUDENT LOAN TRUSTS' SECOND  
AMENDED CORPORATE DISCLOSURE  
STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel of record for defendants National Collegiate Student Loan Trust 2004-1; National Collegiate Student Loan Trust 2004-2; National Collegiate Student Loan Trust 2005-1; National Collegiate Student Loan Trust 2005-2; National Collegiate Student Loan Trust 2005-3; National Collegiate Student Loan Trust 2006-1; National Collegiate Student Loan Trust 2006-2; National Collegiate Student Loan Trust 2007-1; National Collegiate Student Loan Trust 2007-2; (the "NCSLTs") hereby advises the court that each NCSLT is a Delaware Statutory Trust, 12 Del. C. § 3801, *et seq.* The NCSLTs have no parent corporation and no publicly held corporation owns 10% or more of its stock.

1 Although the NCSLTs do not believe additional disclosures are warranted based on its  
2 structure, per a meet and confer with Plaintiff's counsel, the NCSLTs also state as follows:

3 The NCSLTs have issued residual notes to two beneficiaries:

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5 1. **NC Owners LLC:** NC Owners LLC (formerly known as The National Collegiate  
6 Funding LLC) is a Delaware limited liability company whose only member is NC Residuals  
7 Owners Trust. NC Residual Owners Trust is a Delaware statutory trust whose sole beneficiary is  
8 VCG Securities, LLC. VCG Securities LLC is a Florida limited liability company with one  
9 member, VCG Securities Holdings, Inc. VCG Securities Holdings, Inc. is a Delaware corporation  
10 which has a principal place of business located in Delray Beach, Florida.

11 2. **Pathmark Associates, LLC:** Pathmark Associates, LLC is a Delaware limited  
12 liability company solely owned by CECE and Co. Ltd., LLC, a Delaware limited liability company  
13 with a principal place of business in New York. CECE and Co. Ltd., LLC is owned by a St. Nevis  
14 offshore company, which, in turn, is solely owned by two foreign nationals.

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16 The undersigned counsel was retained to represent the NCSLTs by U.S. Bank National  
17 Association ("U.S. Bank"), in its capacity as Successor Special Servicer, and hereby advises the  
18 court that U.S. Bank is a wholly owned subsidiary of U.S. Bancorp, a publicly held corporation.  
19 U.S. Bancorp has no parent corporation, and no publicly held corporation owns 10% or more of  
20 its stock.  
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2 DATED: June 12, 2020

3 By: s/ Kristine E. Kruger  
4 By: s/ Thomas N. Abbott  
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6 Thomas N. Abbott #53024  
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**CERTIFICATE OF SERVICE**

I hereby certify under the penalty of perjury under the laws of the United States that on the date below, I electronically served the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of records.

DATED at Castro Valley, California this 12th day of June, 2020.

/s/ Matthew Walkup  
Matthew Walkup, Legal Practice Assistant